

Comment No.	BMP No. (10-15-07)	Date	Commenter	BMP Title	Comment	Response
1	2	10/17/2007	IEA	"Use drip pans, etc., to collect leaks/spills"	This BMP table shows this BMP as applicable to "Cement mixing or cutting, painting, masonry." This appears to be an error and should be deleted.	The BMP table was edited because the "Use drip pans, etc., to collect leaks/spills" BMP is not applicable to "Cement mixing or cutting, painting, masonry."
2	3	10/17/2007	IEA	"Clean Floor Mats Indoors"	Cleaning floor mats from entry ways and cafeterias should be allowed to be cleaned with potable water (or biodegradable detergent) on a grassy area. The water would filter into the landscape and would not be an issue for the storm drain. Floor mats can be large and cumbersome. There may not be an adequate location in which to clean them indoors.	The BMP description was changed to: "Wash kitchen floor mats and entry/exit door mats such that wash water is captured and directed to sanitary sewer system <i>or wash mats with potable water or biodegradable detergent on landscape area.</i> "
3	4	9/14/2007	Stewart Payne	Properly dispose of process or wash water	"Properly" needs to be clearly defined. Providing literature that explains the methods/practices that meet the minimum requirement to establish proper disposal should be provided to power washing companies. Too often we are leaving it up to the interpretation of the powerwasher and then trying to hold/him or her accountable for standards that are not clearly defined or universally understood.	The Storm Water Pollution Prevention Division will be developing and distributing fact sheets with the assistance of stakeholders that provide more detailed guidance.
4	5	9/14/2007	Stewart Payne	Immediately clean up spills with dry methods	"Dry methods" needs to be clearly defined. Publishing literature that provides a list of acceptable dry methods with instructions to properly perform those methods should be provided to power washing companies. It may also be advisable to solicit the help of power washing companies to help develop these methods and procedures.	The Storm Water Pollution Prevention Division will be developing and distributing fact sheets with the assistance of stakeholders that provide more detailed guidance.
5	6	10/17/2007	IEA	"Maintain spill cleanup materials and have wet vacuum or similar equipment readily available"	Wet vacuums are not appropriate for all spills, such as gasoline, so this BMP should be revised to just state: "Maintain spill cleanup materials."	The BMP title was changed to: "Have <i>necessary materials and equipment</i> readily available. Maintain a spill clean up kit"
6	7 and 8	10/17/2007	IEA	"Wash vehicles and equipment in designated areas."	This BMP should state: "Wash vehicles and equipment in designated areas and implement practices to prevent water from entering the storm drain."	This BMP titles were changed to: "Wash vehicles and equipment in designated areas <i>and implement practices to prevent water from entering the storm drain system.</i> "
7	7 and 8		Think Blue	"Wash vehicles and equipment in designated areas."	Suggest promotion of bucket use, sponge and chamois (to dry) when washing vehicles—most of the time soapy water is not needed. (Hoses were not used to wash wagons) one half—gallon bucket and sponge is sufficient to wash five vehicles. The residue (almost the entire half gallon can then be poured on a plant or lawn.	The descriptions now include " <i>Use a control nozzle or similar method to minimize unnecessary amounts of runoff.</i> " The Storm Water Pollution Prevention Division will be developing and distributing fact sheets with the assistance of stakeholders that provide more detailed guidance.
8	9	10/17/2007	IEA	"Properly store and dispose of green waste."	Waste clippings should also be able to be used for groundcover/mulch when this use will not result in the material getting into storm drains. The second sentence of the "Description and examples" for this BMP should be revised to state "Store waste clippings, compost, use for ground cover, etc., in areas that do not drain directly to the storm drain system."	The BMP description was changed to "Do not dump or leave green matter from landscaping maintenance where it could enter the storm drain system. Take to green waste section of landfill, <i>or use appropriately on site.</i> "

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9	11	10/1/2007	Roy Funk	"Contain discharge water from fire system maintenance activities"	I would like to comment of the section regarding containment of discharge water from fire system maintenance activities. In many cases, the only method to accomplish this to replumb the fire system into the sewer lines, which can be quite costly. Therefore, as a result, some fire systems are not being tested, which if inoperable, could jeopardize human life and property. Most fire systems are only tested annually —the amount of discharge into the storm water system would be minimal and as fire system water is "city water", the potential pollutants should be minimal as well. In the interest of life safety and property safety I would like to see some consideration be given to allowing exemptions on at least an annual basis for fire system maintenance and testing.	<p>The BMP description was changed to: "Prevent discharge of water during testing of fire sprinkler maintenance systems by directing water to sanitary sewer system or wet vacuuming from a paved area." It is important to note that the City of San Diego currently does not allow discharge of fire sprinkler water to the storm drain system. Additionally, widely accepted guidance from the California Storm Water Quality Association's Industrial and Commercial Best Management Practices Handbook (section SC-41) states that, although it can vary between systems, the following pollutants may be present in the flushed water: oil coating, nitrates, polyphosphates and other corrosion inhibitors, fire suppressants, antifreeze, iron, manganese, lead, copper, nickel, zinc, living and dead bacteria, and breakdown products from chlorination. Therefore, the City considers fire sprinkler water a potentially significant source of pollution.</p> <p>In an effort to accommodate older buildings which are plumbed to the storm drain, the Storm Water Pollution Prevention Division is recommending that the City Council adopt amendments to the City's Storm Water Management and Discharge Control Ordinance (Section 43.03 et seq.) which would allow for the City to authorize fire sprinkler discharges, which are classified as "non-emergency fire fighting flows," to the storm drain system provided that City-approved BMPs are employed to remove pollutants from the discharge. However, until such BMPs are approved by the City, fire sprinkler discharges to the Storm drain system would continue to be prohibited. The proposed Ordinance language reads:</p> <p>"§ 43.0305 Exemptions from Discharge Prohibition The following discharges are exempt from the prohibition set forth in Section 43.0305: (a) [No change to text.] (b) Discharges from the following activities which do not cause or contribute to the violation of any Plan Water Quality Objective and are not a significant source of pollutants into or from the Storm Water Conveyance System: [Sections 1-16 not shown here] (17) non-emergency fire fighting flows from controlled or practice blazes and fire suppression equipment maintenance activities, provided such discharges are not prohibited categorically by Best Management Practices established by the Enforcement Official pursuant to Section 43.0307(a), and provided further that such discharges comply with all Best Management Practices established by the Enforcement Official under Section 43.0307(a). (c) [No change to text.] (d) [No change to text.]"</p>
10	14	10/17/2007	IEA	"Schedule during dry weather any outdoor activities that could release pollutants"	Many facilities conduct their operations outdoors. The wording of this measure means that no work can be done during rain events.	This BMP title was changed to " <i>When there is flexibility</i> schedule during dry weather any outdoor activities that could release pollutants." This BMP will be promoted through the City's education/outreach program.
11	15	10/17/2007	IEA	"Label containers and maintain up-to-date inventory to prevent mishandling of hazardous materials."	The "Description and Examples" for this BMP specifies recordkeeping, labeling and handling requirements that are duplicative of other federal, state and local requirements. This BMP should state: "Hazardous materials should be managed in accordance with current regulations."	The last sentence of the BMP description was changed to: "Clearly label containers with contents and any special handling instructions <i>in accordance with current regulations</i> ."
12	17	10/17/2007	IEA	"Provide pollution prevention signage for storm drains, material storage, etc."	The second sentence of the "Description and Examples" for this BMP states: "Provide signage indicating nature of materials stored onsite, particularly hazardous materials." The BMP specifies requirements that are duplicative of other federal, state and local requirements and should be revised to state: "Provide signage in accordance with current regulations".	The BMP description was changed to "Provide concrete stamping or equivalent on all onsite drainage inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). Provide signage indicating nature of materials stored onsite, particularly hazardous materials, <i>in accordance with current regulations</i> ."
13	21	9/14/2007	Stewart Payne	Protect Storm drains from non-storm water discharges	Publishing literature that gives examples and instructions on acceptable methods to protect the storm drain from non storm water discharges would be a step in the right direction. Currently, it is left up to the power washer to determine what is acceptable method or practice to protect the storm drain. They are then held responsible to meet a standard established by the individual code compliance officers. It has also been my experience that the code compliance officers don't have a clearly defined interpretation or universal understanding of what is acceptable.	The Storm Water Pollution Prevention Division will be developing and distributing fact sheets with the assistance of stakeholders that provide more detailed guidance.

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14	22	10/17/2007	IEA	"Contain over-irrigation runoff"	This BMP goes beyond the permit requirements, as the Municipal storm water permit identifies "landscape irrigation", "irrigation water" and "lawn watering" as non-storm water discharges that are not prohibited unless the co-permittee identifies the discharge category as a significant source of pollutants to waters of the U.S. The BMPs need to be flexible enough to acknowledge that some runoff may occur as a function of these activities, although it needs to be minimized. Containing irrigation runoff is not practical, nor, in many cases, feasible. An alternative BMP could state: "Measures should be taken to minimize irrigation runoff."	This BMP title and descriptive text was changed to " <i>minimize</i> " irrigation runoff.
15	General	10/17/2007	IEA	General	Major industrial facilities are already highly regulated under federal direct discharge NPDES permits or statewide general industrial storm water permits. These facilities already have in place stringent and extensive control measures to insure that storm water contaminants of significance do not reach the municipal storm water sewer system (MS4). In addition to the permit requirements, the facilities have in place a Storm Water Pollution Prevention Plan (SWPPP), which includes BMPs, and are required to file an annual report, requiring a corporate officers' signature, certifying compliance. A facility covered in this manner should be allowed to "self-certify" and not be required to pay additional fees or have duplicative inspections...Any needed "certification" should be satisfied by submitting a copy of the certification for the storm water NPDES permit annual report.	The 2007 Municipal Permit does not allow for self-certification of industrial and commercial facilities. However, if the Regional Board inspects a facility and notifies Storm Water Pollution Prevention Division in a timely manner, or if the business owner can provide documentation of an inspection that meets the 2007 Municipal Permit requirements, Storm Water Division will not perform a second inspection that year.
16	General	10/17/2007	IEA	General	Also, additional BMPs should not be required beyond those implemented to comply with those [NPDES] permits.	The City's NPDES Municipal Stormwater Permit is distinct from Industrial Discharge NPDES permits and carries its own separate requirements regarding BMPs for industrial facilities. As a municipal discharger the City must regulate all industrial businesses with municipal BMPs. The scope of the Municipal Permit is broader than regulating just industrial sites, though industrial sites must be included in the comprehensive municipal program. Therefore the minimum BMPs identified by the City as part of its Jurisdictional Urban Runoff Management Plan, as required as part of the City's Municipal NPDES Permit, do not have to be identical to those in other NPDES permits, such as the General Industrial NPDES Permit. In developing these municipal BMPs, the City has attempted to rely on common BMPs typically included in storm water pollution prevention plans required under the General Industrial NPDES permit wherever possible. Most of the minimum industrial/commercial BMPs needed for municipal compliance will already be required in a properly prepared Storm Water Pollution Prevention Plans for sites subject to the General Industrial NPDES Permit. But the requirements are not entirely duplicative, and there may be additional or different municipal permit requirements for a given industry. Any municipal industrial BMPs that are not already required by the General Industrial Permit have been developed to be consistent with the draft Jurisdictional Urban Runoff Management Program's minimum municipal BMPs established for similar City-maintained facilities and have been identified as BMPs that are required to protect storm water quality to the maximum extent practicable.
17	31	10/17/2007	IEA	"Develop and implement Spill Prevention Plan"	Also, the last sentence of the "Description and Examples" should state "Train appropriate employees in spill response procedures."	Although BMP #31 was removed, a similar BMP, #30, was changed to " <i>Train appropriate employees</i> on storm water pollution prevention" in order to be applicable only to employees who may potentially generate spills.
18	31	10/17/2007	IEA	"Develop and implement Spill Prevention Plan"	Many facilities do not store oil in quantities that subject them to the requirement of 40 CFR 112, which includes preparation of a Spill Prevention, Control and Countermeasure (SPCC) plan. This BMP needs to clarify that it is applicable only to those facilities that are subject to development of emergency response and contingency plans, such as SPCC or Hazardous Materials Business Plan regulations and storm water NPDES regulations.	This BMP title was changed to " <i>Have written procedures</i> for preventing and responding to spills." The description now states: "Facilities subject to regulations such as SPCC or Hazardous Materials Business Plan regulations, already should have developed plans in accordance with guidance provided by State, City, and County emergency management departments. For businesses not subject to emergency response and contingency plans as described above, provide <i>written procedures for preventing and responding to spills. Documents should be appropriate in scale to facility activities and the potential discharges.</i> Post procedures in appropriate areas and train appropriate employees in spill response procedures."

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19	32	10/17/2007	IEA	"Develop and Implement SWPPP"	The BMP needs to clarify that it is only applicable to those facilities that are subject to storm water permitting pursuant to federal NPDES regulations.	This BMP title was changed to "Develop a written plan for the appropriate BMPs for your facility" and how they will be implemented." The description now says "Facilities subject to storm water permitting pursuant to State General Industrial Permit regulations already have Storm Water Pollution Prevention Plans. For businesses not subject to the State General Industrial Permit, provide a storm water pollution prevention plan appropriate in scale to facility activities and potential discharges. Update those plan as site conditions or activities change."
20			Think Blue	General	The storm drain department/division (whatever its called this year) is responsible for both the storm drain and the adjacent sidewalk parking between Garber and Gaeber on Parkside in Paradise Hills (92139) (Garber is semi-circular street beginning and ending on Parkside. For the past three or four years maintenance of the ditch and the parking has been virtually non-existent. Bringing the problem to your division has not brought any sense of pride. Smart remarks that 'until the weeds block the sidewalk we aren't doing anything' do not impress the community-in truth it angers them. Trim the weeds as if it was the front of you house AND you were trying to sell it.	Street Division will inspect the weeds in the pakway areas and take any necessary action. Environmental Permits may be required in order to perform storm drain channel maintenance. Street Division is in the process of obtaining the required environmental permits.
21	11	10/17/2007	IEA	"Contain discharge water from fire system maintenance activities"	<p>Our major concern is with BMP No. 11 to contain discharge water from fire system maintenance activities. City ordinance language that fire system maintenance activities are an "illegal discharge to the storm drain" should be revised because fire suppression and water line flushing do not rise to the level of "significant" sources of pollutants. Facilities are delaying critical testing of their systems because of prohibitions, engineering and retrofitting concerns. Following are specific areas of concern:</p> <p>—No Requirement by Regional Board: First, we should like to cite Section B.2 of the RWQCB Permit CA S0108758 that states: 'Emergency fire fighting flows (i.e., flows necessary for the protection of life of property) do not require BMPs and need not be prohibited. As part of the Jurisdictional Urban Runoff Management Plan (URMP), each co-permittee shall develop and implement a program to reduce pollutants from non-emergency fire fighting flows (i.e., flows from controlled or practice blazes and maintenance activities) identified by the co-permittee to be significant sources of pollutants to waters of the U.S.'</p> <p>—Inconsistency amongst Co-Permittees in the County: Only 7 of the jurisdictions in the country address fire discharge as prohibited to the MS4 system.</p> <p>[Inconsistency with] Uniform Plumbing Requirements * Section 812.0 Clear Water Wastes – includes sprinkler systems —Section 805.0 Pressure Drainage Connections – cannot be directly connected to sanitary drainage system —Section 801.4 connection from water distribution system – requires an air gap above flood level rim of receptor (e.g., above manhole or drain inlet rim)</p>	<p>See response to Comment No. 9, above.</p> <p>Comment noted. Since 2001, the City has prohibited the fire sprinkler maintenance discharges.</p> <p>The City reviewed the referenced Uniform Plumbing Code requirements and determined that it is feasible to comply with this BMP without violating these codes. For example, water can be discharged into a tank or other system that collects the water prior to discharging to the sewer at the permitted release rate. This can be accomplished without directly connecting them to a sanitary sewer line and while maintaining the required airgap above the flood level rim of the receptor. It is ultimately the responsibility of the building owner to implement the solution, or combination of solutions, that prevents the discharge of fire system maintenance water to the storm drain system. If the minimum BMP is approved by City Council, the Storm Water Pollution Prevention Division will pursue making updates to local plumbing, building and fire codes so that new buildings do not plumb fire sprinkler systems to the storm drain system.</p>

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					<p>[Inconsistency with] National Fire Protection Association (NFPA 13 Standard Requirements)</p> <p>The National Fire Protection Association Standard Requirements:</p> <p>—Section 8.15.2.1 Drainage, General – all sprinkler pipe and fitting must be installed to drain</p> <p>—Section 8.15.2.4.4 System, Main Drain, or Section Drain connections – drains shall discharge outside or to a drain connection</p> <p>—Section 8.15.2.6.1 Discharge of Drain – Valves ...direct interconnections shall not be made between the sprinkler drains and sewers.</p>	<p>The City reviewed the referenced National Fire Protection Association Standard Requirements and determined that it is feasible to comply with this BMP without violating these codes. For example, an outside drain connection can still be a sanitary sewer connection. The connection can still include an air gap as required. A direct connection is not required to drain a pressurized system through an air gap to a gravity sanitary sewer. It is ultimately the responsibility of the building owner to implement the solution, or combination of solutions, that prevents the discharge of fire system maintenance water to the storm drain system. If the minimum BMP is approved by City Council, the Storm Water Pollution Prevention Division will pursue making updates to local plumbing, building and fire codes so that new buildings do not plumb fire sprinkler systems to the storm drain system.</p>
					<p>No provisions to allow for facilities plumbed directly into the storm drain system. For facilities that have already been plumbed directly into the storm drain system, as allowed by plumbing and building codes, re-engineering and retrofitting costs are unreasonable. These facilities should be "grandfathered."</p>	<p>The City has prohibited the discharge of fire system maintenance water to the storm drain system in its Storm Water Ordinance since 2001 without a grandfathering clause. Facilities that are already plumbed to the storm drain system can collect discharged water and pump the water to the sanitary sewer at the permitted release rate if retrofitting is not feasible. It is ultimately the responsibility of the building owner to implement the solution, or combination of solutions, that prevents the discharge of fire system maintenance water to the storm drain system. It should be noted that the City will continue with its current practice of only issuing monetary fines when pollutant discharges to the storm drain system are identified; education will be the initial enforcement tool when minimum BMPs are not implemented (in the absence of a discharge). Therefore, if buildings are found to be plumbed to the storm drain system, initial enforcement actions for failing to adhere to the minimum BMPs will be education-based. This policy may change in the future after industries have been properly notified and educated, and provided additional guidance via to-be-developed</p>
					<p>[Inconsistency with] Other permit testing requirements: In some circumstances, facilities governed under other permits are required to test their fire sprinkler maintenance system water, which can take up to a week. Discharging to the sanitary sewer, in such circumstances, is not an option.</p>	<p>Compliance with this BMP will not prevent meeting these other permit testing requirements, but may require employing methods to capture and manage the release rate of water. One option is to store the discharged water in tanks and release to the sanitary sewer at the permitted release rate. Another option is to "section" the fire suppression system and test sections - this will depend on the water distribution network. It is ultimately the responsibility of the building owner to implement the solution, or combination of solutions, that prevents the discharge of fire system maintenance water to the storm drain system.</p>